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6 *Attorneys for Defendant*
7 *Synchrony Bank*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 DONALD R. ROBINSON,

11 Plaintiff,

12 vs.

13 GREAT PLAINS LENDING, LLC,
14 SYNCHRONY LENDING, INC., AND
TRANS UNION LLC,

15 Defendants.

Case No. 2:18-cv-01763-JAD-NJK

**SECOND STIPULATION
EXTENDING TIME FOR
DEFENDANT SYNCHRONY
LENDING, INC. TO RESPOND TO
COMPLAINT**

16
17 Plaintiff Donald R. Robinson (“Plaintiff”) and Defendant Synchrony Bank, improperly
18 named as Synchrony Lending, Inc. (“Synchrony”) through their respective counsel, hereby
19 stipulate and agree as set forth below:

20 RECITALS

21 A. Plaintiff filed a Complaint (“Complaint”) against Synchrony on September 11,
22 2018, and Synchrony was served with the Complaint on September 25, 2018.

23 B. The parties previously stipulated to an extension of time to respond through
24 November 6, 2018 in order to give Synchrony time to investigate Plaintiffs’ claims and
25 prepare a proper response, and for the parties to discuss a potential resolution of this matter.

26 C. The investigation into this matter has not yet been completed.

27 D. With additional time, the parties are optimistic that this matter can be resolved
28 prior to the filing of responsive pleadings.

1 E. Therefore, there is good cause to grant this stipulation because Synchrony
2 requires additional time to investigate Plaintiffs' claims, and the parties require additional
3 time to consider a resolution of this matter.

4 F. This stipulation is filed in good faith and not intended to cause delay.

5 G. Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and Synchrony
6 respectfully request that the Court extend Synchrony's time to respond to Plaintiffs'
7 Complaint through November 27, 2018.

8 STIPULATION

9 NOW, THEREFORE, Plaintiff and Synchrony hereby stipulate and agree that
10 Synchrony has up to and including November 27, 2018, to file a response to Plaintiffs'
11 Complaint.

12 **IT IS SO STIPULATED.**

13 DATED this 30th day of October, 2018.

14 **KAZEROUNI LAW GROUP, APC**

15
16 By: /s/ Michael Kind
17 Michael Kind (NV Bar #13903)
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22 *Attorney for Plaintiff*
23 *Donald R. Robinson*

DATED this 30th day of October, 2018.

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Attorneys for Defendant
Synchrony Bank

24 ORDER

25 **IT IS SO ORDERED.**

26 
United States Magistrate Judge

27 DATED October 31, 2018
28